



Daniel Horwitz <daniel.a.horwitz@gmail.com>

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## Ray Crouch Prosecution of Joshua Garton

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**Mary E. McCullohs** <Mary.McCullohs@ag.tn.gov>

Wed, Jun 2, 2021 at 4:55 PM

To: "Daniel A. Horwitz" <daniel@horwitz.law>

Cc: Brice Timmons <Brice@donatilaw.com>, Craig Edgington <craig@donatilaw.com>, Lindsay Smith <lindsay@horwitz.law>

Mr. Horwitz,

Thank you for your email. As we stand by the assertions in General Crouch's dismissal motion memorandum, we respectfully decline your request.

**Mary Elizabeth McCullohs** | Senior Assistant Attorney General

Civil Law Division

Office of Tennessee Attorney General

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**From:** Daniel A. Horwitz <daniel@horwitz.law>

**Sent:** Friday, May 28, 2021 1:02 PM

**To:** Mary E. McCullohs <Mary.McCullohs@ag.tn.gov>

**Cc:** Brice Timmons <Brice@donatilaw.com>; Craig Edgington <craig@donatilaw.com>; Lindsay Smith <lindsay@horwitz.law>

**Subject:** Ray Crouch Prosecution of Joshua Garton

Dear General McCullohs:

I hope you are well.

Your filing today in Middle District of Tennessee Case No. 3:21-cv-00338, *Garton v. Crouch*, et al., asserts, among other things, that Mr. Garton's concern "that General Crouch desires to prosecute Plaintiff again for this meme is neither actual, concrete, or particularized and does not establish imminent threat of harm." To clarify your claim on the matter: Is your client affirmatively disclaiming all future investigation and prosecution of Mr. Garton regarding this matter? If so, please kindly provide an affidavit to that effect from District Attorney Crouch at your earliest convenience. To my knowledge, your client has never made any such commitment to date, though if I am mistaken about that, please kindly correct me.

All the best,

-Daniel Horwitz

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